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Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	Case No. 22-10943 (MEW)
)	
Debtors. ¹)	(Jointly Administered)
)	

**NOTICE OF FILING OF
AMENDED SCHEDULE RELATING TO THE
PLAN ADMINISTRATOR'S SECOND OMNIBUS
OBJECTION TO CERTAIN FILED PROOFS OF CLAIM**

PLEASE TAKE NOTICE that on September 22, 2023, the Plan Administrator (the "Plan Administrator") for the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket 1166-1] of Voyager Digital Holdings, Inc., *et al.* (collectively, the "Wind-Down Debtor") filed the *Plan*

¹ The Wind-Down Debtor in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address for purposes of these chapter 11 cases is 27777 Franklin, Suite 2500, Southfield, MI 48034.

Administrator's Second Omnibus Objection to Certain Filed Proofs of Claim [Docket No. 1588]
(the "Objection").

PLEASE TAKE FURTHER NOTICE that in connection with the filing of the Objection, the Wind-Down Debtor filed Schedules 1-4 to the Proposed Order.²

PLEASE TAKE FURTHER NOTICE that the Wind-Down Debtor hereby files the attached amended Schedule 4 to the Proposed Order, removing from Schedule 4 the single objected-to claim listed on that schedule, which claim has now been consensually resolved, and a redline to the previously filed Schedule 4 (the "Amended Schedule 4"):

Exhibit A: Amended Schedule 4 to the Proposed Order

Exhibit B: Redline of Schedule 4.

PLEASE TAKE FURTHER NOTICE that the removal of any Claim from the Amended Schedule 4 shall not be an admission as to the validity of such Claim, and the Wind-Down Debtor's rights and defenses to any Claim not included in the Amended Schedule 4, including the right to objection to such Claim at a later date, are expressly preserved.

[Remainder of page intentionally left blank]

² Capitalized terms used and not defined herein have the meaning ascribed to them in the Objection.

Dated: New York, New York
October 27, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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Exhibit A

Amended Schedule 4 to the Proposed Order

Claim Identifier	Name of Claimant	Claim Reference Number	Debtor Name	Claim Number	Date Filed	Current Claim Amount	Current Coin Amount	Reason for Objection	Treatment for Objection
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TOTALS

\$0.00 Various

Exhibit B

Redline of Schedule 4

Claim Identifier	Name of Claimant	Claim Reference Number	Debtor Name	Claim Number	Date Filed	Current Claim Amount	Current Coin Amount	Reason for Objection	Treatment for Objection
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
4	Texas Attorney General's Office		Voyager Digital, LLC	12404	01/17/2023	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General: \$0.00 Unsecured: \$0.00 Contingent/Unliquidated: \$0.00 Total: Contingent/Unliquidated		No Liability	Disallow -- Books and Records

TOTALS

\$0.00 Various

Voyager Digital Holdings, Inc., et al.
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